



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Dennis Richardson, Treasurer
Oregon Republican Party
570 Liberty Street, SE, Suite 200
Salem, OR 97301

APR 19 2000

Identification Number: C00153031

Reference: Year End Report (7/1/99-12/31/99)

Dear Mr. Richardson:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-The Detailed Summary Page, on Line 18 Column A of your report, discloses \$115,556.45 in transfers from the non-federal account for joint activity for the reporting period. However, Line 21(a)(ii) Column A discloses \$104,674.49 as the non-federal share for joint activity for the reporting period. While the non-federal account is permitted to transfer funds to the federal account for allocable activity, transfers from the non-federal account for amounts greater than the non-federal share of allocable activity are prohibited by 11 CFR §102.5(a)(1)(i). Please clarify this discrepancy.

The Commission recommends that you immediately transfer back to the non-federal account, the amount which was transferred to the federal account in excess of the non-federal share. Although the Commission may take further legal action concerning this prohibited activity, your prompt action will be taken into consideration.

-It appears that your non-federal account has transferred-in money to your federal account to pay for direct candidate support activities benefiting Pirozzi for Congress (pertinent portion(s) attached). Furthermore, Schedule B supporting Line 23 discloses contributions in the same amounts to Pirozzi for Congress (pertinent portion(s) attached). Be aware that your non-

federal account may not reimburse your federal account for contributions to federal candidates. By definition, a shared activity is one which benefits both federal and non-federal candidates or committees.

Please clarify the nature of these activities, specifically whether non-federal candidates or committees were included. If non-federal candidates or committees were not included in the activities, the Commission recommends that you immediately transfer the funds received by your federal account for these activities back to the non-federal account. Although the Commission may take further legal action concerning this prohibited activity, your prompt action will be taken into consideration.

-Schedule H3 discloses a transfer(s) which is categorized as direct candidate support; however, a Schedule H2 has not been filed to disclose the allocation ratio. All committees are required to allocate the payment for direct candidate support in which the committee collects both federal and non-federal funds. The costs are allocated according to the time and space method or funds received ratio and reported on Schedule H2. 11 CFR §§106.5(f) and 106.6(d). Please file a Schedule H2 to disclose the ratio for the direct candidate support activity.

-Your report lists the name of the account on Schedules H3 as your committee's address. Be advised the account should be a non-federal account. Please amend your report to clarify the NAME OF ACCOUNT on Schedules H3.

-Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedule H4 of your report to clarify the following description(s): "consulting". For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).

-Your report discloses a payment(s) on Schedule D to FHL&S, which has not been recorded on a disbursement schedule. Debt payments must be reflected on Schedule B or H4 as well as on Schedule D. Please amend your report to clarify this discrepancy. 2 U.S.C. §434(b)(5)(D)

-Schedule D discloses the outstanding balance at the close of the period for the debt owed to Henderson Co. to be \$15,000. FEC calculations disclose

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this amount to be \$24,929.52. Please amend your report to clarify this discrepancy.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,



Lucy J. Denny
Reports Analyst
Reports Analysis Division

RECEIPT SCHEDULE H3
 (Effective 1/1/91)

**TRANSFERS FROM
NON-FEDERAL ACCOUNTS**

 PAGE 5 OF 16
 FOR LINE 18

NAME OF COMMITTEE Oregon Republican Party		TOTAL AMOUNT TRANSFERRED	
NAME OF ACCOUNT Oregon 570 Liberty SE #200		DATE OF RECEIPT 10/21/1999	\$ 1600.00
BREAKDOWN OF TRANSFER RECEIVED			
	ADMIN/VOTER DRIVE AMOUNT	DIRECT FUND-RAISING AMOUNT	EXEMPT ACTIVITY/DIRECT CANDIDATE SUPPORT
i) Total Administrative/Voter Drive	\$1600.00		
ii) Direct Fundraising (List Events-Amount for Each)			
a)			
b)			
c)			
d)			
e) Total Amount Transferred For Direct Fundraising			
iii) Exempt Activity/Direct Candidate Support (List Events-Amount For Each)			
a)			
b)			
c)			
d)			
e) Total Amount Transferred For Exempt Activity/Direct Candidate Support			
NAME OF ACCOUNT Oregon 570 Liberty SE #200		DATE OF RECEIPT 11/05/1999	\$ 27000.00
BREAKDOWN OF TRANSFER RECEIVED			
	ADMIN/VOTER DRIVE AMOUNT	DIRECT FUND-RAISING AMOUNT	EXEMPT ACTIVITY/DIRECT CANDIDATE SUPPORT
i) Total Administrative/Voter Drive	\$ 17000.00		
ii) Direct Fundraising (List Events-Amount for Each)			
a)			
b)			
c)			
d)			
e) Total Amount Transferred For Direct Fundraising			
iii) Exempt Activity/Direct Candidate Support (List Events-Amount For Each)			
a) Pirozzi CA-42 debt retire			\$5000.00
b) Pirozzi CA-42 general, special			\$5000.00
c)			
d)			
e) Total Amount Transferred For Exempt Activity/Direct Candidate Support			
TOTALS FOR BREAKDOWN OF TRANSFER RECEIVED			
	ADMIN/VOTER DRIVE AMOUNT	DIRECT FUND-RAISING AMOUNT	EXEMPT ACTIVITY/DIRECT CANDIDATE SUPPORT
SUBTOTAL THIS PAGE	17,000.00		10,000.00
TOTAL THIS PERIOD			28,000.00

SCHEDULE B

ITEMIZED DISBURSEMENTS

See separate schedule(s)
for each category of the
Detailed Summary PagePAGE 1 OF 1
FOR LINE NUMBER 23

Any information copied from such reports and statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)
Oregon Republican Party

Full Name, Mailing Address and Zip Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Pirozzi For Congress 9209 Archibald Ave Rancho Cucamonga, CA 91729-	CA-42 Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	11/09/1999	5,000.00
Pirozzi For Congress 9209 Archibald Ave Rancho Cucamonga, CA 91729-	Primary Debt retirement contribution Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	11/04/1999	5,000.00
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SUBTOTAL of Disbursements This Page (optional)

10,000.00

TOTAL This Period (last page this line number only)

10,000.00

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